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DWIGHT L. DOVE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

DWIGHT DOVE,

Plaintiff,

v.

BAYER HEALTHCARE, Biological Products
Division, a for profit business entity,

Defendant.

CASE NO. C-05-02873 JSW

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING DISCOVERY AND
DISPOSITIVE MOTION SCHEDULE**

Judge: Honorable Jeffrey S. White

Trial Date: None Set.

WHEREAS, plaintiff's deposition was noticed for January 18th, 2006;

WHEREAS, plaintiff requested that his deposition be moved to January 27th, 2006;

WHEREAS, the matters *Jones v. Bayer*, case no. C-03-05531 JSW, and *Woods v. Bayer*,
case no. C-05-02871 JSW, are deemed related to this matter;

WHEREAS, this Court had set the dispositive motion hearing date for this matter on calendar
for March 24, 2006, prior to the dispositive motion hearing date in the *Jones* and the *Woods* matters,

1 both currently set for hearing on April 7, 2006;

2 WHEREAS, plaintiff Jones's deposition was noticed for January 9-10th, 2006;

3 WHEREAS, plaintiff Jones has requested that his deposition be pushed back to January 18-
4 19th, 2006;

5 WHEREAS, the dispositive motion in this matter should be heard prior to the dispositive
6 motion in the *Jones* and the *Woods* matters because there are less claims in this matter;

7 WHEREAS, contemporaneous stipulations and [proposed] orders on the *Jones* and *Woods*
8 matters are filed herewith to accommodate the continuances of depositions requested by the
9 respective plaintiffs without prejudicing Bayer and its ability to complete discovery in a timely
10 fashion and to have a full and complete hearing on its dispositive motions;

11 WHEREAS, plaintiff, on the one hand, and Bayer, on the other hand, are collectively
12 adverse, they agree through their respective counsel and stipulate as follows:

- 13 1. The hearing on the dispositive motion(s) will now take place on April 7, 2006; and
14 2. Close of non-expert discovery: February 27, 2006.

15 **IT IS SO STIPULATED.**

16
17 DATED: January 13, 2006

MOORE & MOORE

18
19 By: /s/

HOWARD MOORE, JR.

Attorney for Plaintiffs

LAVON JONES, JR., NATHANIEL WOODS,
JR., HABEN BERHANE, and DWIGHT L.
DOVE

20
21
22
23 DATED: January 13, 2006

By: /s/

CHARLES STEPHEN RALSTON

Attorney for Plaintiff

DWIGHT DOVE

1 DATED: January 13, 2006

THE LOUDERBACK LAW FIRM

3 By: /s/

JEROME SCHREIBSTEIN

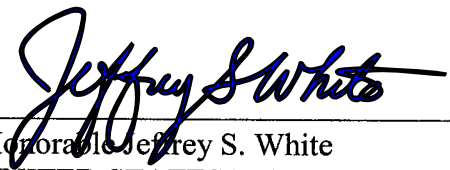
JAMES T. CONLEY

Attorneys for Defendant

BAYER HEALTHCARE LLC

7 **IT IS SO ORDERED.**

9 Dated: January 13, 2006


Honorable Jeffrey S. White
UNITED STATES DISTRICT JUDGE